

March 21, 2024

**Via ECF**

Hon. Katherine Polk Failla, U.S.D.J. (S.D.N.Y.)

**MEMO ENDORSED**

**Re: *George Hofmann*, Chapter 7 Trustee of the Estate of  
*Simply, Inc.*, v. *SOL Global, Inc.*, et. al., No. 22-CV-1007—Status Update**

Your Honor:

The parties jointly submit this status update as ordered following the conference held on Plaintiff's application for an Order to Show Cause directing turnover of assets.

Plaintiff has sent an Information Subpoenas with Document Requests and Deposition Notices to uncover assets in aid of enforcement to Defendants via their counsel, as planned at the OTSC conference. Defendants have stated that they intend to produce documents in response to the Subpoena on or before **April 1, 2024**. Plaintiff is scheduled to depose Defendants' Rule 30(b)(6) representative on **April 10, 2024**, at 10:00 AM EST (via Zoom).

The parties have also engaged in further settlement discussions, which are ongoing.

Plaintiff has also sent an Information Subpoena with Restraining Notice to Heavenly Rx, the owner of the accounts that are the subject of Plaintiff's turnover motion. Plaintiff intends to request an order compelling a response from Heavenly Rx. or other action as may be warranted following the discovery to be taken from SOL Gobal.

The parties propose to update the Court in another 30 days, following SOL Global's production of documents and deposition.

Jointly respectfully submitted,

/s/ Miriam Tauber

Miriam Tauber (Miriam Tauber Law PLLC)  
*Attorney for Plaintiff/Judgment Creditor*  
*George Hofmann*,  
Chapter 7 Trustee for the Estate of *Simply, Inc.*

/s/ John Thompson

John Thompson (Thompson & Skrabanek, PLLC)  
*Attorney for Defendants/Judgment Debtors*  
*SOL Global Investments Corp.*,  
*SOL Verano Blocker I, LLC*

Application GRANTED. The parties shall jointly file another letter updating the Court on the status of the case on or before **April 28, 2024**.

Dated: March 22, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE